

January 2, 2008

Mississippi River/Gulf of Mexico Draft 2008 Action Plan (4304T)
c/o Jacques L. Oliver
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Mr. Oliver:

Please accept these comments from Illinois Farm Bureau regarding the Mississippi River/Gulf of Mexico Draft 2008 Action Plan.

Illinois Farm Bureau is a grassroots organization whose members include about three-fourths of the farmers in the state of Illinois. We support voluntary best management practices for agriculture to continue the positive natural resource trends we have seen.

We have expressed many concerns with the direction taken by various reports through the years related to the Gulf of Mexico Watershed. We continue to urge that there be a recognition that voluntary incentive-based programs work for agriculture. The challenge is that these programs have been historically underfunded and understaffed, even with the increased funding sited in the Draft Action Plan.

It is not logical to assume that mandates in any form for agriculture are needed to address issues related to the Gulf. The truth is that farmers are interested in and are on waiting lists for voluntary programs but these programs have not been adequately funded.

Regardless of inadequate funding, agriculture has a positive conservation story to tell. Conservation tillage practices have reduced soil erosion by 35 to 40% on cropland in our state, Illinois landowners planted more than 31 million trees from 1988 to 1997, Illinois farmers planted more than 35,000 miles of conservation buffers from 1997 to 2002, farmers are making a more efficient use of fertilizers, and between 1997 and 2001, about 181,000 acres of buffers were installed in Illinois.

We believe future actions of the federal government and the Task Force should be to support increasing funds for states and locally lead watershed groups to increase the positive trends we have seen. The Task Force should encourage the administration of voluntary conservation programs at the state or local

watershed level and states should be able to develop their own strategies. The role of the federal government should be to ensure there is adequate funding for local voluntary programs. We do not need a one-size-fits-all, prescriptive approach from the federal government dictating to the state where BMPs should be placed and conservation practices implemented.

The Draft Action Plan also references the establishment of nutrient standards. The draft standards that have been discussed are neither achievable nor scientifically defensible and the outcomes of rushing to establish such standards could have a severe economic impact throughout the Midwest.

We also recommend that the goal of reducing the zone to 5,000 square kilometers by 2015 be changed. It is not achievable. We disagree with the statement on page 5 of the Draft Action Plan that the 5,000 square kilometer goal is "a reasonable endpoint". The Draft Plan also states that the Task Force understands the difficulty of meeting the 2015 goal.

We recommend that this is the time to therefore change the goal to reflect information we have gathered in the past several years that clearly point to the fact that simplistic solutions will not work and the system is far more complicated than some have publicly acknowledged. It has been stated that the reduction goals are substantial and even more questionable given the fact that actions to meet the target will take decades and that significant uncertainties remains.

Current reports or plans must recognize the detrimental economic impact that could be placed on production agriculture by unrealistic goals set in the midst of uncertainties with a top down approach from the federal government. An example of one unrealistic idea that has been discussed in other reports is the elimination of fall N application. This is neither feasible nor achievable. We also believe that policies which have far reaching impacts made regarding the Gulf of Mexico must be backed by current scientific research.

We urge that expectations and goals regarding the Gulf of Mexico be realistic and should address the concerns of those at the state and local level who actually implement conservation practices. We can achieve much if we work together to address complex issues such as this one.

Thank you for the opportunity to express our views on the Draft Action Plan.

Sincerely,

Nancy Erickson, Director
Natural and Environmental Resources